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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Richard Klein, Raymond Urias and Sandra J.
Gunter, individually and on behalf of all others
similarly situated,

Plaintiffs,

-vs.-

National Collegiate Student Loan Trust 2005-3, *et*
al.,

Defendant.

CASE NO:2:22-cv-01392-GMN-BNW

CLASS ACTION

**STIPULATION AND ORDER FOR
EXTENDING TIME FOR PLAINTIFFS
TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

(SECOND REQUEST)

Current Response Date: April 5, 2023

New Response Date: April 19, 2023

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein, Raymond
Urias and Sandra J. Gunter ("Plaintiffs") and Transworld Systems Inc. ("TSI") and
National Collegiate Student Loan Trust ("NCSLT") 2005-2, NCSLT 2006-3, NCSLT 2007-1,
NCSLT 2007-2, and NCSLT 2007-3, and NCSLT 2007-4) (the "Trust Defendants") (collectively,
"Defendants") (Plaintiffs and Defendants collectively referred to as the "Parties"), by and through
their respective counsel of record, hereby stipulate, agree and respectfully request that the Court

1 extend the deadline for the Plaintiffs to file their responses to the Trust Defendants' Motion to
2 Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) from April 5, 2023 to April
3 19, 2023.¹

- 4 1. On December 23, 2022, Plaintiffs filed their First Amended Complaint. ECF NO. 20.
- 5 2. On December 28, 2022, Plaintiffs served the Summons and First Amended Complaint on
6 TSI. ECF No. 23.
- 7 3. On December 29, 2022, Plaintiffs served the Summons and First Amended Complaint on
8 NCSLTs. ECF No. 24.
- 9 4. Therefore, TSI's original response due date was January 18, 2023 and the Trust
10 Defendants' original response due date was January 19, 2023.
- 11 5. The Trust Defendants' counsel needed additional time to investigate the new allegations
12 and the Parties agreed to an extension of time for Defendants to respond to the First
13 Amended Complaint through and until February 6, 2023. ECF No. 25
- 14 6. TSI's counsel needed additional time to evaluate the information necessary to respond to
15 the Complaint and the Parties agreed to an extension of time for Defendant to respond to
16 the First Amended Complaint through and until February 6, 2023. ECF No. 26.
- 17 7. Defendants then needed additional time to evaluate the information necessary to
18 appropriately respond to the First Amended Complaint and the Parties agreed to an
19 extension of time to respond to the First Amended Complaint through and until March 8,
20 2023.
- 21 8. On March 8, 2023, the Trust Defendants and TSI filed their respective Motions to Dismiss
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28 ¹ Both NCSLT's Motion to Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) were filed on March
8, 2023.

Plaintiffs' First Amended Complaint ("Motions to Dismiss"). ECF Nos. 39 & 40.

9. Plaintiffs' deadline to respond to these Motions to Dismiss was March 22, 2023.

10. The Parties Stipulated to extend Plaintiffs' deadline to response to the Motions to Dismiss to April 5, 2023. ECF No. 47.

11. The Parties have discussed extending the deadline Plaintiffs have to respond to Defendants' Motions to Dismiss as Plaintiffs' Counsel have either been traveling or sick leading up to the deadline for Plaintiffs' to respond. Also, the procedural and substantive issues in this case are complex and additional time is required to address these issues.

WHEREAS, the parties hereby stipulate and agree to extend the deadline for Plaintiffs to file their responses to Defendants' Motions to Dismiss (ECF Nos. 39 & 40) to April 19, 2023.

IT IS SO STIPULATED.

Dated: April 5, 2023

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Dated: April 5, 2023

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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: April 5, 2023